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Honorable Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

July 31, 2007

*So ordered. No work
enlargement 8-1-07
Alvin Hellerstein*

Re: Medina v. City of New York, et al., 07 Civ. 6215 (AKH)

Your Honor:

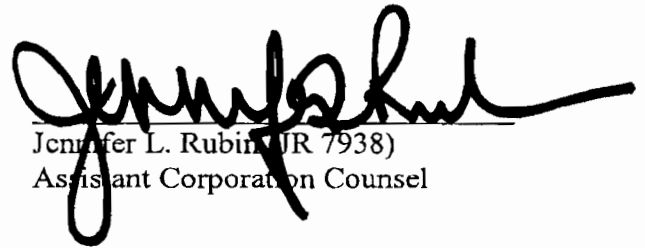
I am an Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, representing defendant City of New York. I write to respectfully request an enlargement of time from July 30, 2007 until September 28, 2007 for the City of New York to answer or otherwise respond to plaintiff's complaint. Plaintiff's counsel, David Zelman, Esq., has agreed to the enlargement of time.

In accordance with this office's obligation under Rule 11 of the Federal Rules of Civil Procedure, we need time to investigate the allegations of the complaint. In this case, plaintiff alleges, *inter alia*, that he was detained and subjected to excessive force by members of the New York City Police Department. Accordingly, it is necessary for defendant City of New York to acquire as much information as possible concerning this matter in order to properly assess the case and respond to the complaint. To that end, this office is in the process of forwarding to plaintiff for execution a N.Y.C.P.L. § 160.50 release so that we can access the sealed records from this underlying action.

Accordingly, defendant City of New York respectfully requests that their time to respond to the complaint be extended to September 28, 2007.

Thank you for your consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jennifer L. Rubin", is written over a horizontal line. Below the line, the name and title are printed.

Jennifer L. Rubin (JR 7938)
Assistant Corporation Counsel

cc: David A. Zelman, Esq. (By Fax)
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